

Hon. Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MEGAN MING FRANCIS, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE,

Defendant.

No. 2:19-cv-1317-RAJ

**JOINT MOTION FOR  
EXTENSION OF TIME TO  
FILE JOINT STATUS  
REPORT**

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TO FILE JOINT STATUS REPORT– Page 1  
*Megan Ming Francis, et al. v. Dep’t of Justice, 2:19-cv-1317-RAJ*

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1 Plaintiffs Megan Ming Francis, Matthew J. Connelly, Mary L. Dudziak, Matthew L.  
 2 Jones, Hiroshi Motomura, Campaign for Accountability, and the Knight First Amendment  
 3 Institute at Columbia University (collectively, “Plaintiffs”) and Defendant United States  
 4 Department of Justice (“Defendant”), jointly move for a seven-day extension of time to submit  
 5 the parties’ Fourth Joint Status Report to the Court.

6 On August 11, 2020, this Court issued an Amended Scheduling Order setting November  
 7 6, 2020 as the deadline for the parties’ Fourth Joint Status Report. *See* ECF No. 21. As described  
 8 in the parties’ Third Joint Status Report, *see* ECF No. 20 at 4, the parties have been engaged in  
 9 negotiations over the continued production of records responsive to Plaintiffs’ request and  
 10 whether Plaintiffs will narrow their request. The parties met and conferred telephonically on  
 11 October 27, 2020 and are diligently continuing to discuss proposals to narrow Plaintiffs’ request  
 12 and ensure the efficient production of records in this case. To that end, the parties request a brief  
 13 continuance of the deadline to file the parties’ Fourth Joint Status Report from November 6,  
 14 2020 to November 13, 2020.

15  
 16 DATED: November 3, 2020

Respectfully submitted,

17 /s/ Alex Abdo

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